

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X ECF Case

ROCHELLE BAEZ,

Plaintiff,

14 Civ. 6621(AT)(HP)

v.

ANNE FONTAINE USA, INC., ARI ZLOTKIN &  
CINDY D'LUZANSKY

Defendants.

-----X

**AFFIRMATION OF LAUREN GOLDBERG IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Lauren Goldberg, upon penalty of perjury, affirm as follows:

1. I am a partner at the Law Offices of Lauren Goldberg, PLLC and represent the Plaintiff in this matter.
2. I am fully familiar with the facts of this case and make this affirmation in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment.
3. Attached as Exhibit A are bonus statements for Rochelly Baez for 2013- January 2014. They are date stamped 251, 239, 236, 217 and 206.
4. Attached as Exhibit B is an offer letter addressed to Laura Stevens for the position of North America Director dated January 21, 2014. The letter is date stamped AF 703.
5. Attached as Exhibit C is an email from Amanda Blynn to Ari Zlotkin dated January 14, 2014. The email is date stamped 288.
6. Attached as Exhibit D is an email from Ari Zlotkin to Rochelly Baez dated December 31, 2013. The email is date stamped AF 453.
7. Attached as Exhibit E is a copy of the Amended Complaint.

8. Attached as Exhibit F is an email from Cindy D'Luzansky to Rochelly Baez dated January 16, 2014. The email is bated stamped 292-293.
9. Attached as Exhibit G is an email from Rochelly Baez to Ari Zlotkin dated December 31, 2013. The email is bated stamped AF 453- 454.
10. Attached as Exhibit H is an email from Cindy D'Luzansky to Becki Woods dated January 6, 2014. The email is bated stamped AF 468.
11. Attached as Exhibit I is an email from Ari Zlotkin to Laura Stevens dated October 28, 2013. The email is bated stamped AF 692.
12. Attached as Exhibit J is an email from Ari Zlotkin to Rochelly Baez dated February 27, 2014. The email is bated stamped AF 672.

Dated: New York, New York  
March 21, 2016



Lauren Goldberg